

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LTD.

Plaintiff,

v.

APPLE INC.

Defendant.

CASE NO. 6:21-cv-00401-ADA

JURY TRIAL DEMANDED

**DECLARATION OF MARK ROLLINS IN SUPPORT OF DEFENDANTS' OPPOSED
MOTION TO STAY PENDING FINAL RESOLUTION OF PLAINTIFF'S
MANUFACTURER LAWSUITS**

I, Mark Rollins, hereby declare and state as follows:

1. I am over 18 years of age and competent to make this declaration. I am employed as a Finance Manager at Apple Inc. ("Apple") and my primary place of work is Cupertino, California. I have been employed by Apple since 2019.

2. I provide this declaration in support of Apple with respect to *Sonrai Memory Ltd. v. Apple Inc.*, Case No. 6:21-cv-00401-ADA. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge, my review of corporate records maintained by Apple in the ordinary course of business, and/or my discussions with Apple employees. If called to testify as a witness in this matter, I could and would testify competently and truthfully to each of the statements in this declaration under oath.

3. I understand that Sonrai Memory Limited ("Sonrai") filed the above-captioned patent infringement lawsuit against Apple in the United States District Court for the Western District of Texas ("WDTX"). In its Complaint for Patent Infringement filed on April 23, 2021

(“the Complaint”), Sonrai alleges infringement of U.S. Patent Nos. 6,724,241 (the “’241 patent” or the “asserted patent”). Dkt. 1 (“Compl.”) ¶ 1.

4. Based on the Complaint, I understand that Sonrai has alleged that SanDisk/Toshiba 64L 3D NAND flash chips with the die identifier FRN1256G (“Accused Kioxia and Western Digital Chips”) infringe the asserted patent. Ex. 2 to Complaint. Sonrai alleges that the Accused Kioxia and Western Digital Chips are in the Apple iPhone SE A2275. *Id.* Compl., ¶ 9.

5. Based on Sonrai’s Complaint and the title of the ’241 patent, I understand that the ’241 patent generally relates to a “Variable Charge Pump Circuit with Dynamic Load.” Compl. ¶ 8. Despite Sonrai’s lack of description of the subject matter of the ’241 patent, for purposes of this motion to transfer, I understand that Sonrai has accused specific circuitry (the charge pump circuit) within the Accused Kioxia and Western Digital Chips that are supplied to Apple (“accused feature”). *Id.* ¶¶ 8-9, Ex. 2.

6. As set forth below, and based on our current investigation to date, I understand that Kioxia Corporation and Kioxia America, Inc. (“Kioxia”) and Western Digital Technologies, Inc. (“WD”) (collectively “third-party suppliers”) supply Apple with the Accused Kioxia and Western Digital Chips used in Apple’s products, and Kioxia (formerly Toshiba) and WD (which owns the SanDisk brand) are the only entities to supply the Accused Kioxia and Western Digital Chips to Apple.

7. Based on our current investigation to date, I understand that no Apple employees have any information regarding the research, design, development or operation of the accused charge pump circuitry within the Accused Kioxia and Western Digital Chips that are supplied to Apple nor do Kioxia and Western Digital share with Apple details regarding the design,

development or operation of the charge pump circuitry. I understand that Apple has no working files or electronic documents concerning the charge pump circuitry within the Accused Kioxia and Western Digital Chips. I further understand, based on our current investigation to date, that Apple does not have any circuit schematics or any other information reflecting the design or operation of the charge pump circuit within the Accused Kioxia and Western Digital Chips that are supplied to Apple and that Apple is not aware of the inner workings and operation of the Accused Kioxia and Western Digital Chips, including the charge pump circuit sub-component within the Accused Kioxia and Western Digital Chips. I further understand that Apple does not have access to any circuit designs for the Accused Kioxia and Western Digital Chips supplied to Apple by Kioxia and WD. I further understand that Apple does not, and cannot, modify the design of the circuits in the Accused Kioxia and Western Digital Chips that it receives from Kioxia and Western Digital and integrates the Accused Kioxia and Western Digital Chips “as is” with respect to the circuit design.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 3rd day of December 2021, in Santa Clara, California.



Mark Rollins